

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS PENSION FUND)	
AND WELFARE FUNDS,)	
)	
Plaintiff,)	
)	No. 08 C 1228
v.)	
)	Judge Guzman
)	
KHLOUD HEGAZIN, Individually and d/b/a)	Magistrate Judge Keys
AMERICAN GROUP TRUCKING CO.)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF
MOTION TO COMPEL DISCOVERY RESPONSES

NOW COMES the undersigned, ANTHONY B. SANDERS, upon being first duly sworn,
deposes and states as follows:

1. The undersigned is an attorney with the law firm of Arnold & Kadjan, whose counsel are counsel of record in Case No. 08 C 1228.
2. Affiant is an attorney licensed to practice law in the State of Illinois since 2006. Affiant is admitted to the United States District Court for the Northern District of Illinois.
3. Plaintiffs issued Interrogatories and Requests to Produce upon Defendant on April 15, 2008 to be responded to 30 days after receipt.
4. Plaintiffs issued a Notice of Deposition on April 15, 2008 for a deposition of Khloud Hegazin, to be held on May 28, 2008
5. Defendant has not responded to Interrogatories or Request to Produce, and Ms. Hegazin has not made herself available for a deposition.

6. Pursuant to Local Rule 37.2 , on May 30, 2008, I attempted to contact James Taylor, attorney for Defendant, regarding a response to our discovery and left a voice mail.

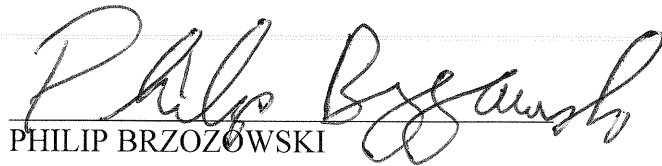
7. On June 2, 2008 I spoke with Mr. Taylor regarding his client's response to Plaintiffs' discovery requests. Mr. Taylor indicated that the response would be sent out by Wednesday, June 4, 2008.

8. Plaintiffs have not yet received Defendant's response to the Interrogatories, Request to Produce and Ms. Hegazin has not been made available for a deposition.

9. The production of records, answers to Interrogatories and deposition of Ms. Hegazin are necessary to ascertain the amount owing to the Funds.

10. This Court has set a discovery cutoff date of July 7, 2008.

FURTHER AFFIANT SAYETH NOT.


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